

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA

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In Re:

Chapter 7

Case No. 21-42169

Quality Machine of Iowa, Inc.,

Debtor.

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**APPLICATION FOR APPROVAL OF  
COUNSEL: RECOMMENDATION AND ORDER**

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1. Applicant is the trustee in this case.

2. Applicant believes that the employment of counsel is necessary to represent or assist the trustee in carrying out the trustee's duties as follows: To represent the trustee in connection with reviewing, analyzing and objecting to positions taken in connection with the escrow agreement and in connection with avoidance actions, including analyzing defenses, negotiating settlements and, if necessary, commencing adversary proceedings regarding avoidance actions.

3. Manty & Associates, P.A. is qualified by reason of practice and experience to render such representation or assistance.

4. Manty & Associates has agreed to perform services as counsel on an hourly fee plus costs basis. Fees and costs shall be subject to court review and approval. However, Manty & Associates may reimburse itself for out-of-pocket expenses, including, but not limited to, serving creditors and parties in interest with various pleadings and notices without prior court approval. The payment of the out-of-pocket expenses will be subject to final court approval and disgorgement in the fee application process. The employment shall be effective as of July 18, 2022.

5. Manty & Associates will calculate its fees for professional services in accordance with agreed-upon hourly rates for these services, as such rates are subject to adjustment from time to time, for inflation and other factors. The current compensation range for attorneys working on these matters is \$400.00 to \$580.00, and \$160.00 to \$210.00 for paralegal assistance. Manty & Associates adjusts its rates periodically, generally on January 1 of each year.

6. In connection with the reimbursement of actual, necessary expenses, Manty & Associates has advised the trustee that it charges expenses, including long-distance telephone, facsimile charges, U.S. Mail and overnight mail charges, photocopying charges, computerized research, transcription costs, travel and lodging costs and court filing fees.

7. To the best of the trustee's knowledge, information and belief, and except as set forth in the Verified Statement, Manty & Associates has disclosed to the undersigned that it does not

represent any creditors in connection with the chapter 7 cases, and is disinterested within the meaning of 11 U.S.C. §§ 327(a), 328 and Fed. R. Bankr. P. 2014. Manty & Associates does not have any connection with the debtors, their estates or any party in interest, their representatives, attorneys and accountants, the United States Trustee for Region 12 or any person employed with the Office of the United States Trustee for Region 12, except that Nauni Manty of Manty & Associates, is a Chapter 7 trustee on the panel in the District of Minnesota and has been and is appointed by the United States Trustee in other unrelated matters.

8. The trustee has made the following efforts to recover the asset prior to submitting this application: The trustee has communicated with the debtor's attorney regarding the various issues and position taken, reviewed the demand letter, escrow agreement and other documents. The trustee needs legal representation to research or litigate various matters.

WHEREFORE, applicant prays that the court approve such employment by the trustee.

Dated: July 18, 2022

/e/ Nauni Manty

Nauni Manty, Trustee

150 South Fifth Street, Suite 3125

Minneapolis, MN 55402

(612) 465-0990

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**VERIFIED STATEMENT PURSUANT TO FEDERAL RULE 2014(a)**

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I, Nauni Manty of Manty & Associates, P.A., the professional named in the application for employment on behalf of the above-named bankruptcy estate, declare under penalty of perjury the following:

1. Manty & Associates does not hold or represent any interest adverse to the estates and is disinterested as required by 11 U.S.C. §327 and hereby declares that it has no connections with the debtors, creditors, parties in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the Office of the United States Trustee. Manty & Associates will continue to review the docket in this case and provide the court with additional disclosures, if necessary.

2. Manty & Associates does not have any connections to the debtor, creditors, any other party in interest, her respective attorneys and accountants, the United States Trustee, or any person employed in the offices of the United States Trustee for Region 12, except that Nauni Manty of Manty & Associates, is a Chapter 7 trustee on the panel in the District of Minnesota and has been and is appointed by the United States Trustee in other unrelated matters.

3. Manty & Associates will continue to monitor and assess all of its client relationships to ensure that Manty & Associates is, and remains, disinterested. In addition, Manty & Associates will disclose on an ongoing basis any relationship that may affect its disinterestedness.

Dated: July 18, 2022

MANTY & ASSOCIATES, P.A.

/s/ Nauni Manty

Nauni Manty (#230352)

150 South Fifth Street, Suite 3125

Minneapolis, MN 55402

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**ORDER**

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The trustee's application to approve the employment of Manty & Associates, P.A. as the trustee's attorneys came before the court.

Based on the application, the recommendation of the United States Trustee and 11 United States Code §327,

IT IS ORDERED: The employment is approved.

Dated:

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William J. Fisher  
United States Bankruptcy Judge